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CHUNGHWA PICTURE TUBES (MALAYSIA)
SDN. BHD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-CV-5944 SC
MDL No. 1917

This Document Relates To:

Best Buy Co. Inc. et al. v. Hitachi, Ltd. et al., No.
3:11-cv-05513-SC

*ViewSonic Corp. v. Chunghwa Picture Tubes,
Ltd. et al.*, No. 3:14-cv-02510-SC

**DECLARATION OF RACHEL S. BRASS
IN SUPPORT OF DEFENDANTS
CHUNGHWA PICTURE TUBES, LTD.
AND CHUNGHWA PICTURE TUBES
(MALAYSIA) SDN. BHD.'S REPLY IN
SUPPORT OF THEIR MOTION IN
LIMINE TO EXCLUDE OPINIONS OR
CALCULATIONS REGARDING ACTUAL
DAMAGES ATTRIBUTABLE TO THE
CHUNGHWA DEFENDANTS**

REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

1 I, Rachel S. Brass, hereby declare as follows:

2 1. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd. (collectively,
4 “Chunghwa”) in the above-referenced action.

5 2. I submit this declaration in support of Defendants Chunghwa Picture Tubes, Ltd. and
6 Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.’s Reply in Support of Their Motion in Limine to
7 Exclude Opinions or Calculations Regarding Actual Damages Attributable to Chunghwa Defendants.
8 Unless otherwise indicated, I have personal knowledge of the foregoing and could and would testify
9 to the same if called as a witness in this matter.

10 3. Attached as **Exhibit 1** is a true and correct copy of a “Visitation Report,” dated March
11 20, 1998, produced by Chunghwa as CHU00028472-74, with accompanying certified English
12 translation CHU00028472E-74E.

13 4. Attached as **Exhibit 2** is a true and correct copy of a “Customer Contact Report,”
14 dated November 7, 1997, produced by Chunghwa as CHU00028490-92, with accompanying certified
15 English translation CHU00028490E-92E.

16 5. Attached as **Exhibit 3** is a true and correct copy of a “Visiting Report,” dated
17 November 4, 1997, produced by Chunghwa as CHU00028677-79, with accompanying certified
18 English translation CHU00028677E-79E.

19 6. Attached as **Exhibit 4** is a true and correct copy of cited excerpts from the certified
20 deposition transcript of Dr. Alan S. Frankel, which took place on July 10, 2014.

21 7. We do not have any records of receiving [REDACTED] ViewSonic
22 referenced in its Opposition Brief. On March 5, 2015, our office contacted counsel for ViewSonic
23 asking them to identify the file in Dr. Frankel’s backup materials. Counsel for ViewSonic replied on
24 March 6, 2015. A true and correct copy of that email exchange is attached as **Exhibit 5**.

25 8. In their response, ViewSonic’s counsel stated that the “[REDACTED]
26 [REDACTED]
27 [REDACTED]
28 ViewSonic’s counsel also “[REDACTED]

1 [REDACTED] A true and correct copy of that Word document is
2 attached as **Exhibit 6**. The only highlighted words in that document are “[REDACTED]” which
3 appear at the bottom of page four.

4 I declare under penalty of perjury that the foregoing is true and correct.

5 Executed this 6th day of March 2015, at San Francisco, California.

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7 By: /s/ Rachel S. Brass
8 Rachel S. Brass
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DECLARATION OF SERVICE

I, Joseph Hansen, declare as follows:

I am employed in the County of San Francisco, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 555 Mission Street, Suite 3000, San Francisco, California, 94105, in said County and State. On the date below, I served the within:

**DECLARATION OF RACHEL S. BRASS IN SUPPORT OF DEFENDANTS
CHUNGHWA PICTURE TUBES, LTD. AND CHUNGHWA PICTURE TUBES
(MALAYSIA) SDN. BHD.'S REPLY IN SUPPORT OF THEIR MOTION IN LIMINE
TO EXCLUDE OPINIONS OR CALCULATIONS REGARDING ACTUAL
DAMAGES ATTRIBUTABLE TO THE CHUNGHWA DEFENDANTS**

to all named counsel of record as follows:

☒ **BY ECF (ELECTRONIC CASE FILING):** I e-filed the above-detailed documents utilizing the United States District Court, Northern District of California's mandated ECF (Electronic Case Filing) service on March 6, 2015. Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the documents upon confirmation of e-filing.

I certify under penalty of perjury that the foregoing is true and correct, that the foregoing document(s) were printed on recycled paper, and that this Declaration of Service was executed by me on March 6, 2015, at San Francisco, California.

/s/ Joseph Hansen

Joseph Hansen

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